

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN) ECF Case
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This document relates to:

Federal Insurance Co., et al. v. Al Qaida, et al., Case No. 03-cv-06978
Thomas Burnett, Sr., at al. v. Al Baraka Inv. & Dev. Corp., et al., Case No. 03-cv-09849
Kathleen Ashton, et al. v. Al Qaeda Islamic Army, et al., Case No. 02-cv-06977
Estate of John P. O'Neill, Sr., et al. v. Al Baraka, et al., Case No. 04-cv-01923
Continental Casualty Co., et al. v. Al Qaeda, et al., Case No. 04-cv-05970
Cantor Fitzgerald & Co., et al. v. Akida Bank Private Ltd., et al., Case No. 04-cv-07065
Euro Brokers, Inc., et al. v. Al Baraka, et al., Case No. 04-cv-07279

**DECLARATION OF J. SCOTT TARBUTTON TRANSMITTING DOCUMENTS IN
SUPPORT OF PLAINTIFFS' MOTION TO COMPEL DEFENDANTS WORLD
ASSEMBLY OF MUSLIM YOUTH-SAUDI ARABIA AND WORLD ASSEMBLY OF
MUSLIM YOUTH-INTERNATIONAL TO PRODUCE RESPONSIVE DOCUMENTS
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 37(a)**

I, J. Scott Tarbutton affirm, under penalty of perjury, as follows:

1. I am an attorney admitted to practice *pro hac vice* in the above-captioned matter, and a member of the law firm Cozen O'Connor. I submit this Declaration to transmit to the Court the following documents submitted in support of Plaintiffs' Reply Memorandum of Law in Support of the Motion to Compel Defendants World Assembly of Muslim Youth-Saudi Arabia and World Assembly of Muslim Youth-International to Produce Responsive Documents Pursuant to Federal Rule of Civil Procedure 37(a).

2. Attached hereto as Exhibit 1 is a true and correct copy of WAMYSA001486, 5281, and 5295, including English translations.

3. Attached hereto as Exhibit 2 is a true and correct copy of WAMYSA005439-49, 5667-77, and 5767, including English translations.

4. Attached hereto as Exhibit 3 is a true and correct copy of WAMYSA005787, 5791, and 5802, including English translations.

5. Attached hereto as Exhibit 4 is a true and correct copy of Plaintiffs' chart titled *Relevant Discovery Rulings Issued by Magistrate Judge Frank Maas*, with true and correct copies of the Transcripts of Record for the April 12, 2011, April 26, 2011, June 23, 2011, and November 16, 2011 hearings before U.S. Magistrate Judge Frank Maas.

6. Attached hereto as Exhibit 5 is a true and correct copy of Plaintiffs' chart titled *WAMY Bank Accounts*.

7. Attached hereto as Exhibit 6 is a true and correct copy of Plaintiffs' chart titled *Record Relating to the Saudi Government*, including true and correct copies of IIRO285002, IIRO285013, MWL052935, WAMYSA02444, WAMYSA030193, and WAMYSA02683 with English translations.

8. Attached hereto as Exhibit 7 is a true and correct copy of WAMYSA343448-49, including English translation.

9. Attached hereto as Exhibit 8 is a true and correct copy of WAMYSA052078-80, including English translation.

10. Attached hereto as Exhibit 9 is a true and correct copy of WAMYSA01665-1666, including English translation.

11. Attached hereto as Exhibit 10 is a true and correct copy of WAMYSA051079-83, including English translation.

12. Attached hereto as Exhibit 11 is a true and correct copy of WAMYSA016068, including English translation.

13. Attached hereto as Exhibit 12 is a true and correct copy of WAMYSA052381, including English translation.

14. Attached hereto as Exhibit 13 is a true and correct copy of WAMYSA058431, including English translation.

15. Attached hereto as Exhibit 14 is a true and correct copy of the Transcript of Record for the April 24, 2014 hearing before U.S. Magistrate Judge Frank Maas.

Executed in Philadelphia, Pennsylvania on April 13, 2018.

/s/_____
J. Scott Tarbutton, Esq.

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